

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
ERIC ROMERO-LOBATO,
Defendant.

Case No. 3:18-cr-00047-LRH-CLB

**STIPULATION TO CONTINUE
SENTENCING HEARING
(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED by and through RENE L. VALLADARES, Federal Public Defender and CHRISTOPHER P. FREY, Assistant Federal Public Defender, counsel for ERIC ROMERO-LOBATO and CHRISTOPHER CHIOU, Acting United States Attorney, and MEGAN RACHOW, Assistant United States Attorney, counsel for the UNITED STATES OF AMERICA, that the Sentencing hearing set for March 15, 2022, at 11:00 AM, be vacated and continued to March 29, 2022, at 11:00 AM.

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1 The continuance is necessary for the following reasons:

2 1. This is a joint request by counsel for the Government and counsel for the
3 Defendant, Mr. Romero-Lobato.

4 2. The additional time requested by this Stipulation is reasonable pursuant to
5 Federal Rule of Criminal Procedure 32(b)(2), which states that the “court may, for good cause,
6 change any time limits prescribed in this rule.”

7 3. Both counsel request this additional time in order to allow adequate time to
8 research sentencing issues and to prepare for the sentencing hearing.

9 4. Mr. Romero-Lobato is detained and agrees to the continuance. Specifically, Mr.
10 Romero-Lobato was informed that the continuance will allow defense counsel to continue to
11 gather documents in support of the hearing and provide continuity of counsel.

12 5. This is the first request for continuance of the sentencing hearing.

13 DATED this 8th day of March, 2022.

14 RENE L. VALLADARES
15 Federal Public Defender

16 CHRISTOPHER CHIOU
17 Acting United States Attorney

18 By /s/ Christopher P. Frey
19 CHRISTOPHER P. FREY
20 Assistant Federal Public Defender
21 Counsel for ERIC ROMERO-LOBATO

22 By /s/ Megan Rachow
23 MEGAN RACHOW
24 Assistant United States Attorney
25 Counsel for the Government

ORDER

Based on the Stipulation of counsel, and good cause appearing,

IT IS THEREFORE ORDERED that the Sentencing Hearing currently set for March 15, 2022, at 11:00 AM, be vacated and continued to **March 29, 2022, at 11:00 AM**.

DATED this 8th day of March, 2022.

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LARRY R. HICKS
UNITED STATES DISTRICT JUDGE